

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAMIZ ZIJAD HODZIC,

a/k/a Siki Ramiz Hodzic

SEDINA UNKIC HODZIC,

NIHAD ROSIC,

a/k/a Yahya AbuAyesha Mudzahid,

MEDIHA MEDY SALKICEVIC,

a/k/a Medy Ummuluna,

a/k/a Bosna Mexico,

ARMIN HARCEVIC, and

JASMINKA RAMIC.

Defendants.

Cause No. 4:15-CR-0049 CDP- DDN

**MOTION FOR
CONTINUANCE OF
ARRAIGNMENT AND REVIEW
OF CONDITIONS OF RELEASE**

Comes now the defendant, Armin Harcevic, by and through his attorney of record, Charles D. Swift, and requests that the date of the defendant's Arraignment and review of Conditions of Release set for and March 25, 2015, at 10:00 a.m. be continued to on or after March 27, 2015.

Request for Continuance

In support of his request for continuance, the defendant offers the following reasons:

Defendant's counsel, Attorney Charles Swift, is presently scheduled to be in Santa Ana, California, to participate in a witness proffer related to an ongoing investigation on Wednesday, March 25, 2015. The interview is scheduled to start at 1:00 p.m. Assistant US Attorney, Judith Heinz, has made arrangements for herself, for the witness, for the witness's attorney Charles

MOTION TO CONTINUE HEARING

Swift, and for FBI agents, to be present at the US Attorney's Office in Santa Ana, California for this witness interview. It is expected to last all afternoon on March 25. The meeting required significant coordination of all parties and non-refundable air tickets have already been purchased.

Additionally, defendant Harcevic must be transported from California in order to be present for the Arraignment and the Review of the Conditions of Release Hearing. Based on experience and belief, Mr. Harcevic will not necessarily be transported by this time.

Finally, government counsel has previously filed a Motion of Appeal of the California District Court's Order and Conditions of Release. Under the Local Court Rules for the Eastern District of Missouri, the defendant's briefing on this issue is due on March 25. A continuance would permit the Court time to review all of the pleadings of the parties prior to conducting the hearing, should the hearing be continued to on or after March 27, 2015. Counsel has spoken to US Attorney Matthew Drake, and he does not oppose the change of the date.

Dated this 20th day of March, 2015

/s/ Charles D. Swift
Charles D. Swift
Pro Hac Attorney for Armin Harcevic
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of defendant Harcevic's Motion for a Continuance of Arraignment and Review of Conditions of Release was electronically filed and served on the Court's electronic Filing system:

DATED this 20th day of March, 2015.

/s/ Charles D. Swift

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